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Attorneys for Defendants
 XINGKE ELECTRONICS (DONGGUAN) CO.,
 LTD., formerly known as SINCO ELECTRONICS
 (DONGGUAN) CO., LTD., LIEW YEW SOON
 aka, MARK LIEW, NG CHER YONG. aka CY
 NG, and MUI LIANG TJOA aka ML TJOA

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SINCO TECHNOLOGIES PTE LTD.,

Plaintiff,

vs.

SINCO ELECTRONICS (DONGGUAN) CO.,
 LTD.; XINGKE ELECTRONICS
 (DONGGUAN) CO., LTD.; XINGKE
 ELECTRONICS TECHNOLOGY CO., LTD.;
 SINCOO ELECTRONICS TECHNOLOGY
 CO., LTD.; MUI LIANG TJOA (an
 individual); NG CHER YONG aka CY NG (an
 individual); and LIEW YEW SOON aka
 MARK LIEW (an individual),

Defendants.

Case No. 3:17-cv-05517-EMC

Action Filed: September 22, 2017

***CORRECTED* DECLARATION OF
 JOSEPH FARRIS IN SUPPORT OF
 DEFENDANTS' ADMINISTRATIVE
 MOTION TO FILE UNDER SEAL
 PORTIONS OF:**

**(1) DEFENDANTS' MOTIONS IN LIMINE
 NOS. 1-6**

**(2) PLAINTIFF'S OPPOSITIONS TO
 DEFENDANTS' MOTIONS IN LIMINE
 NOS. 1-6**

Judge: Honorable Edward M. Chen

Trial: November 1, 2021

1 I, Joseph Farris, declare as follows:

2 1. I am an attorney and senior associate at the law firm of Arnold & Porter Kaye
3 Scholer, LLP, counsel of record for Defendants XINGKE ELECTRONICS (DONGGUAN) CO.,
4 LTD., formerly known as SINCO ELECTRONICS (DONGGUAN) CO., LTD. (“XingKe”), MUI
5 LIANG TJOA aka ML TJOA, NG CHER YONG aka CY NG, and LIEW YEW SOON aka MARK
6 LIEW (together, “Defendants”). I am over the age of 18 and competent to testify on the matters
7 herein of my own personal knowledge.

8 2. I submit this declaration pursuant to N.D. Cal. Local Rule 79-5(d) to establish
9 compelling reasons for granting Defendants’ Administrative Motion to File Under Seal Portions of
10 Defendants’ Motions in Limine Nos. 1-6, and Portions of Plaintiff’s Oppositions to Defendants’
11 Motion in Limine Nos. 1-6 (“Defendants’ Administrative Motion to File Under Seal”).

12 3. Attached hereto as **Exhibit 1** is a true and correct copy of the Expert Report of Alan
13 J. Cox, Ph.D., which was attached as Exhibit A to the Farris Declaration in Support of Defendants’
14 Motion in Limine No. 1. Defendants request that this entire document be filed under seal, as this
15 document contains materials designated by one or more parties as “Confidential” or “Confidential -
16 Attorneys’ Eyes Only” and contains confidential information such as revenue reports, personally
17 identifying information, financial information, and/or materials one or more of the parties are
18 contractually obligated to maintain as confidential.

19 4. Attached hereto as **Exhibit 2** is a true and correct copy of the Expert Report of Henry
20 J. Kahrs, CPA/ABV/CFF, CFE, CMA, which was attached as Exhibit B to the Farris Declaration in
21 Support of Defendants’ Motion in Limine No. 1. Defendants request that this entire document be
22 filed under seal, as this document contains materials designated by one or more parties as
23 “Confidential” or “Confidential - Attorneys’ Eyes Only” and contains confidential information such
24 as revenue reports, personally identifying information, financial information, and/or materials one
25 or more of the parties are contractually obligated to maintain as confidential.

26 5. Attached hereto as **Exhibit 3** is a true and correct copy of the Sales and Purchase
27 Reports Humen for years 2013-2017, which were attached as Exhibits 8-12 to the Gaitan Declaration
28 in Support of Plaintiff’s Opposition to Defendants’ Motion in Limine No. 1. Plaintiff has requested

1 that these documents be filed under seal in their entirety.

2 6. Attached hereto as **Exhibit 4** is a true and correct copy of the redacted and unredacted
3 versions email communications bates labelled SINCO516527- SINCO516539, which were attached
4 as Exhibit 175 to the Gaitan Declaration in Support of Plaintiff's Opposition to Defendants' Motion
5 in Limine No. 1. Plaintiff has requested that this document be filed publicly using the proposed
6 redactions, with the unredacted version filed under seal.

7 7. Attached hereto as **Exhibit 5** is a true and correct copy of the redacted and unredacted
8 versions the Minh Chi Nguyen Declaration dated August 7, 2018, which was attached as Exhibit
9 339 to the Gaitan Declaration in Support of Plaintiff's Opposition to Defendants' Motion in Limine
10 No. 1. Plaintiff has requested that this document be filed publicly using the proposed redactions,
11 with the unredacted version filed under seal.

12 8. Attached hereto as **Exhibit 6** is a true and correct copy of the redacted and unredacted
13 versions of a customer audit document, which was attached as Ex. 399 to the Gaitan Declaration in
14 Support of Plaintiff's Opposition to Defendants' Motion in Limine No. 3. Plaintiff has requested
15 that this document be filed publicly using the proposed redactions, with the unredacted version filed
16 under seal.

17 9. Attached hereto as **Exhibit 7** is a true and correct copy of the Master Purchase
18 Agreement between SinCo Dongguan (now XingKe) and Google, which was attached as Exhibit E
19 to the Farris Declaration in Support of Defendants' Motion in Limine No. 4. Plaintiff has requested
20 that this document be filed under seal in its entirety.

21 10. Attached hereto as **Exhibit 8** is a true and correct copy of the redacted and unredacted
22 versions of emails from Mark Liew, which were attached as Exhibit F to the Gaitan Declaration in
23 Support of Plaintiff's Opposition to Defendants' Motion in Limine No. 4. Plaintiff has requested
24 that this document be filed publicly using the proposed redactions, with the unredacted version filed
25 under seal.

26 11. Attached hereto as **Exhibit 9** is a true and correct copy of the redacted and unredacted
27 versions of an email from Mark Liew to Cynthia, which was attached as Exhibit A to the Gaitan
28 Declaration in Support of Plaintiff's Opposition to Defendants' Motion in Limine No. 4. Defendants

1 request that this document be filed publicly using the proposed redactions, with the unredacted
2 version filed under seal, as it contains confidential information such as non-public banking
3 information and personally identifiable information.

4 12. Attached hereto as **Exhibit 10** is a true and correct copy of the redacted and
5 unredacted versions Mark Liew's Visa Application, which was attached as Exhibit B to the Gaitan
6 Declaration in Support of Plaintiff's Opposition to Defendants' Motion in Limine No. 4. Defendants
7 request that this document be filed publicly using the proposed redactions, with the unredacted
8 version filed under seal, as it contains confidential information such as non-public banking
9 information and personally identifiable information.

10 13. Attached hereto as **Exhibit 11** is a true and correct copy of the redacted and
11 unredacted versions of documents bates labelled SINCO576259-60, which was attached as Exhibit
12 G to the Gaitan Declaration in Support of Plaintiff's Opposition to Defendants' Motion in Limine
13 No. 4. Defendants request that this document be filed publicly using the proposed redactions, with
14 the unredacted version filed under seal, as it contains confidential information such as non-public
15 banking information and personally identifiable information.

16 14. Attached hereto as **Exhibit 12** is a true and correct copy of Mr. Ng's employment
17 application, which was attached as Exhibit 3 to the Gaitan Declaration in Support of Plaintiff's
18 Opposition to Defendants' Motion in Limine No. 5. Defendants request that this document be filed
19 publicly using the proposed redactions, with the unredacted version filed under seal, as it contains
20 confidential information such as non-public banking information and personally identifiable
21 information.

22 15. Attached hereto as **Exhibit 13** is a true and correct copy of the redacted and
23 unredacted versions of photographs of ML Tjoa, which were attached as Exhibit 68 to Gaitan
24 Declaration in Support of Plaintiff's Opposition to Defendants' Motion in Limine No. 6. Plaintiff
25 has requested that this document be filed publicly using the proposed redactions, with the unredacted

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1 version filed under seal.

2 I declare under penalty of perjury under the laws of the United States and the State of
3 California that the foregoing is true and correct.

4 Executed this 16th day of September, 2021, in Castro Valley, California.

5 /s/ Joseph Farris

6 JOSEPH FARRIS